

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

SCRAMOGE TECHNOLOGY LTD.,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD. and  
SAMSUNG ELECTRONICS AMERICA,  
INC.,

Defendants.

Case No. 6:21-cv-00454-ADA

SCRAMOGE TECHNOLOGY LTD.,

Plaintiff,

v.

APPLE INC.,

Defendant.

Case No. 6:21-cv-00579-ADA

SCRAMOGE TECHNOLOGY LTD.,

Plaintiff,

v.

GOOGLE LLC,  
Defendant.

Case No. 6:21-cv-00616-ADA

**JOINT CLAIM CONSTRUCTION STATEMENT**

**I. Undisputed Constructions**

The parties do not have any undisputed constructions.

**II. Disputed Constructions**

#	Term	Plaintiff's Proposed Construction	Defendants' Proposed Construction
1	<p>“[arranged/provided] on”            '215 Patent, Claims 1, 9, 13 and 19            (Proposed by all Defendants)</p> <p>'370 Patent, Claims 1 and 9            (Proposed by Samsung and Google)</p>	Plain and ordinary meaning	in contact with directly or indirectly through an adhesive
2	<p>“a [first/second] surface of the plurality of soft magnetic layers”            '215 Patent, Claims 1 and 13            (Proposed by all Defendants)</p>	Plain and ordinary meaning	a [first/second] surface of more than one of the soft magnetic layers
3	<p>“the [first/second] polymeric material layer includes a [first/second] extending portion extending longer than the plurality of soft magnetic layer / the [first/second] polymeric material layer comprises a [first/second] extending portion extending longer than the plurality of soft magnetic layers”            '215 Patent, Claims 1 and 13            (Proposed by Google)</p>	Plain and ordinary meaning	Indefinite
4	<p>“a [first/second] magnetic sheet”            '962 Patent, Claims 1, 7, 9, and 18            (Proposed by all Defendants)</p>	Plain and ordinary meaning	a [first/second] continuous planar magnetic material

#	Term	Plaintiff's Proposed Construction	Defendants' Proposed Construction
5	<p>“wherein a height of a highest position of the second magnetic sheet from the substrate is higher than a height of a lowest position of the receiving coil from the substrate”</p> <p>'962 Patent, Claims 1 and 18 (Proposed by all Defendants)</p>	Plain and ordinary meaning	wherein the highest point of the second magnetic sheet from the substrate in between adjacent receiving coil portions is higher than the lowest point of the receiving coil from the substrate at the adjacent receiving coil portions
6	<p>“a second polymeric film provided on the plurality of soft magnetic layers”</p> <p>'370 Patent, Claim 1 (Proposed by Samsung and Google)</p>	Plain and ordinary meaning	a second polymeric film in contact with more than one of the soft magnetic layers
7	<p>“plurality of soft magnetic layers provided on the first adhesive layer”</p> <p>'370 Patent, Claim 1 (Proposed by Samsung and Google)</p>	Plain and ordinary meaning	more than one soft magnetic layer in contact with the first adhesive layer
8	<p>“the [first/second] polymer film includes a [first/second] extending portion that extends further than the plurality of soft magnetic layers”</p> <p>'370 Patent, Claim 1 (Proposed by Google)</p>	Plain and ordinary meaning	Indefinite

#	Term	Plaintiff's Proposed Construction	Defendants' Proposed Construction
9	<p>“a [first/second] extending adhesive portion that extends further outward than the side portion of the plurality of soft magnetic layers, and a portion of the [first/second] extending adhesive portion is provided in the connected area”</p> <p>'370 Patent, Claims 12 and 15 (Proposed by Google)</p>	Plain and ordinary meaning	Indefinite
10	<p>“receiving space”</p> <p>'740 Patent, Claims 1-3, 6, 7, and 8 (Proposed by Google)</p> <p>'740 Patent, Claims 6, 7, and 16 (Proposed by Apple)</p> <p>'565 Patent, Claims 1 and 12 (Proposed by Apple)</p>	Plain and ordinary meaning	empty space for the connecting unit extending from one surface of the substrate to an opposing surface of the substrate
11	<p>“overlaps the receiving space in a [second] direction parallel to the upper surface of the substrate”</p> <p>'565 Patent, Claims [1], 12 (Proposed by Apple)</p>	Plain and ordinary meaning	Indefinite

#	Term	Plaintiff's Proposed Construction	Defendants' Proposed Construction
12	<p>“a first region in which at least one of the first layer and the second layer overlaps the wireless power receiving coil in a vertical direction perpendicular to an upper surface of the shielding unit”</p> <p>'842 Patent, Claims 1 and 19 (Proposed by Apple)</p>	Plain and ordinary meaning	Indefinite
13	<p>“reception space in a predetermined area”</p> <p>'842 Patent, Claim 15 (Proposed by Apple)</p>	Plain and ordinary meaning	a cavity shaped to allow a wireless charging circuit to be inserted through an opening and into the cavity
14	<p>“disposed as a 2x2 matrix”</p> <p>'476 Patent, Claim 1 (Proposed by Scramoge and Samsung)</p>	arranged such that there are two rows and columns	arranged such that there are two orthogonal rows and columns
15	<p>“disposed under the second coil pattern”</p> <p>'476 Patent, Claims 2, 3, 4 (Proposed by Samsung)</p>	Plain and ordinary meaning	Indefinite
16	<p>“disposed at an inner side of the first magnetic sheet member”</p> <p>'482 Patent, Claim 1 (Proposed by Samsung)</p>	Plain and ordinary meaning	located such that the first magnetic sheet surrounds the second magnetic sheet

Dated: May 2, 2022

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that the counsel of record who are deemed to have consented to electronic service are being served on May 2, 2022 with a copy of this document via the Court's ECF system.

/s/Drew B. Hollander  
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